

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

\_\_\_\_\_  
**IN RE MBNA CORP. ERISA LITIGATION**  
\_\_\_\_\_  
\_\_\_\_\_

)  
) **Master Docket No. 05-429 (GMS)**  
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)

**[PROPOSED] ORDER EXTENDING  
SCHEDULING ORDER DEADLINES**

**WHEREAS** the parties have reached an agreement in principle to settle this matter;

**WHEREAS** the parties will notify the Court by July 21, 2008, of the date by when those settlement papers will be filed;

**WHEREAS** the parties have agreed to adjourn the forthcoming dates in the Amended Scheduling Order (Docket Entry No. 75) for Plaintiffs' motion for class certification (presently due July 22, 2008) and Defendants' motion for summary judgment (presently due August 1, 2008) to allow for time to prepare the settlement papers and for the Court to consider the proposed settlement;

**WHEREAS** the parties have agreed that if this action is not settled, the parties shall be deemed to have reverted to their respective *status quo ante* and will jointly seek a revised scheduling order from the Court:

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel for the parties herein, subject to the Order of this Court, the forthcoming dates in the Amended Scheduling Order for Plaintiffs' motion for class certification and Defendants' motion for summary judgment are adjourned. The parties will notify the Court of a date by when the settlement papers shall be submitted on or before July 21, 2008.

July 16 , 2008

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SO ORDERED, this \_\_\_\_ day of \_\_\_\_, 2008

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Chief United States District Judge